REMARKS

The Examiner's Action mailed on October 23, 2006, has been received and its contents carefully considered.

In this Response, Applicants have made no amendments. Claim 1 is the sole independent claim, and claims 1-25 remain pending in the application. For at least the following reasons, it is submitted that this application is in condition for allowance.

Claims 1-25 were rejected under 35 U.S.C §103(a) as being obvious over *Godwin et al.* (U.S. 6,505,192 B1) in view of *Yeager et al.* (U.S. 2003/0028585 A1). This rejection is respectfully traversed.

The Office action admits on page 3, line 7 thereof that *Godwin et al.* "fails to explicitly disclose building a peer table".

Referring to Fig. 3 of *Godwin et al.* and its description, *Godwin et al.* discloses that rule searching occurs at the Internet protocol (IP) layer, and then determines if an incoming packet contains an authentication header (AH) or an Encapsulation Security Payload (ESP), which is NOT to handle a physical IP address. See, for example, col. 6, lines 47-62 of *Godwin et al.*:

> FIG. 3 shows how Ipsec rule searching has been implemented in the known prior art for packets incoming to a node. *This rule searching occurs at the Internet Protocol (IP) layer. Step 302 determines if an incoming packet contains an authentication header (AH) or an Encapsulating Security Payload (ESP) header.* An AH header specifies that authentication of the origin of this packet be established. An ESP header specifies that the packet is encrypted; an ESP header may also specify authentication, as well as encryption. If either of these headers is present, a Security association must be identified to determine how to authenticate

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or to decrypt the packet. Step **306** locates the applicable Security association using the SPI (Security Parameter Index) as an index into a hash table of Security associations. Step **308** uses the information contained in the SECURITY_ASSOC to decapsulate (authenticate or decrypt) the packet.

Therefore, *Godwin et al.* fails to teach the objective of the claimed invention.

To supply the deficiencies of *Godwin et al.*, the Office Action relies upon *Yeager et al.*, which discloses building a peer confidence table, but the method proposed by *Yeager et al.* is applied to a peer-to-peer (P2P) computer network, and not to a WAN. *Yeager et al.* provides a mechanism for a peer to build a key ring of certificates, and creates a peer confidence table for each key on the key ring that includes the peer's confidence in the certificate and the peer's confidence in the owner of the certificate as a recommender. See, e.g. *Yeager et al.* ¶[0123]:

> In one embodiment, the trust mechanism may be used in calculating codat trust based on a peer's reputation in a given peer group. Since a certificate is one form of codat, in one embodiment the trust mechanism may be applied to a peer's peer group key ring, i.e., a peer group member's collection of signed certificates for a given peer group. In the following discussion, it is assumed that the keyword is "signed certificates" or another keyword used to signify signed certificates, and that the expected response is the search target's peer group key ring contents. In one embodiment, for a peer group(i), a peer may include one or more tables as illustrated in FIGS. 10A and 10B for matches to the keyword "signed certificates," in which codat confidence is replaced with certificate confidence. In one embodiment, the tables illustrated in FIGS. 10A and 10B may be included in the codat confidence table and/or the peer confidence table(s) as illustrated in FIGS. 5A-5C.

Hence, *Yeager et al.* implements trust relationships between and among the peer devices on the P2P platform. However, the claimed invention is applied to wide area networks, and is not suitable for use on a P2P network.

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Furthermore, both *Godwin et al.* and *Yeager et al.*, fail to disclose a peer table that "includes fields of peer identification, address, prefix, and type" as recited in claim 1.

The Office action apparently asserts that the peer confidence table referred to in ¶[0109] of *Yeager et al.* corresponds to the claimed peer table, in stating that *Yeager et al.* "discloses building a peer table (see Yeager [0109])". ¶[0109] of *Yeager et al.* reads as follows:

> One embodiment may provide a mechanism for a peer to build a key ring of certificates, create *a peer confidence table* for each key on the key ring that includes the peer's confidence in the certificate and the peer's confidence in the owner of the certificate as a recommender (weak transitivity). Confidence in a certificate's path of signers may then be computed, and a peer's confidence in another peer as a recommender (weak transitivity) may be updated.

> (*emphasis added*)

A peer confidence table **402** according to a preferred embodiment of *Yeager et al.* is shown in FIG. 5B thereof, and includes only keywords **406**, representing an interest of a peer **200**, and peer confidences **410**. See, e.g., ¶[0069] of *Yeager et al.*:

> In one embodiment, there may be *a peer confidence table 402 as illustrated in FIG. 5B that includes peer confidence information for those peers for which the peer 200 has (keyword, codat) information. In a peer confidence table 402, for each keyword 406 representing an interest of the peer 200, there may exist one or more peer confidences 410 each corresponding to a particular peer that provided a particular codat 500.* In one embodiment, there may be a separate peer confidence table 402 for each peer group in which the peer 200 is a member peer. In one embodiment, the peer confidence table(s) 402 may be included in codat confidence table(s) 400

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as illustrated in FIG. 5A. In one embodiment, peer confidence tables **402** may be used when searching for a codat **500**.

(*emphasis added*)

Consequently, the peer confidence table **402** of *Yeager et al.* fails to include "fields of peer identification, address, prefix, and type" as recited in claim 1, and therefore does not correspond to the peer table recited therein.

Since neither *Godwin et al.* nor *Yeager et al.*, whether taken separately or in combination provides any teaching or suggestion of the above-recited feature of claim 1, the presently claimed invention is non-obvious for at least this reason.

It is submitted that this application is in condition for allowance. Such action and the passing of this case to issue are requested.

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Should the Examiner feel that a conference would help to expedite the prosecution of this application, the Examiner is hereby invited to contact the undersigned counsel to arrange for such an interview.

Should any fee be required, however, the Commissioner is hereby authorized to charge the fee to our Deposit Account No. 18-0002, and advise us accordingly.

Respectfully submitted,

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Date.

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